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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CHUBB EUROPEAN GROUP SE a/s/o  
BURBERRY GROUP PLC,

Plaintiff,

v.

EXPEDITORS INTERNATIONAL OCEAN,

Defendant.

**No. 1:22-cv-03765-JPO**

**DEFENDANT'S FRCP 12(b)(3)  
MOTION TO TRANSFER VENUE**

COMES NOW defendant Expeditors International of Washington, Inc. d/b/a Expeditors International Ocean ("Expeditors") and moves, pursuant to 28 U.S.C. §1404(a) and FRCP 12(b)(3), for an order transferring this action to the U.S. District Court for the Western District of Washington on the ground that all claims against Expeditors asserted herein are subject to a contractual forum selection clause mandating that litigation take place in Washington.

This motion is supported by the concurrently filed Memorandum in Support of Defendant's FRCP (12)(b)(3) Motion to Transfer Venue and Declaration of Colleen Gillespie.

Date: June 21, 2022.

LANE POWELL PC

s/ Steven W. Block

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